

EXHIBIT 1

In the Matter Of:

NEW ENGLAND COMPOUNDING PHARMACY, INC. PRODUCTS LIABILITY LITIGATION

VIDEOTAPED DEPOSITION OF SCOTT BUTLER

February 05, 2015



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1 Q. Where are the three main locations?

2 A. St. Thomas Midtown, St. Thomas West and
3 Skyline Hospital.

4 Q. Now, it was on the campus of St. Thomas
5 West where the epidural and ster -- epidural steroid
6 injections were given that's the subject of this
7 lawsuit; is that correct?

8 A. Yes.

9 Q. Where are the six satellite locations that
10 you mentioned?

11 A. Clarksville, Hopkinsville, Bowling Green,
12 Summit, Columbia. How many is that? Is that six?

13 Q. I wrote down five.

14 A. Okay. And then Franklin.

15 Q. Okay.

16 A. And then one more, Columbia.

17 Q. Thank you. Who is the president of Howell
18 Allen Clinic?

19 A. Greg Lanford.

20 Q. He was the president back in 2011 and 2012;
21 is that correct?

22 A. Yes.

23 Q. Do you hold any official titles with St.
24 Thomas Outpatient Neurosurgical Center?

25 A. I'm a board member.



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1 Q. And it's an e-mail that you sent on October
2 the 9th, 2012; is that right?

3 A. Yes.

4 Q. And the subject is "Two things"; is that
5 correct?

6 A. Yes.

7 Q. Could you read into the record the two
8 things that you e-mailed to Ms. Rudolph.

9 A. "No. 1, our group would like to buy lunch
10 for the ER staff tomorrow. Who can I talk to about
11 coordinating this effort? No. 2, Standard has a great
12 idea. He would like for St. Thomas to have a day of
13 prayer for the patients and families affected by the
14 meningitis outbreak. Good PR move."

15 Q. Now, Standard refers to Dr. Standard; is
16 that correct?

17 A. Yes.

18 Q. And is he one of the owners of Howell Allen
19 Clinic?

20 A. Yes.

21 Q. And when did you decide that having St.
22 Thomas organize a day of prayer for the patients and
23 families affected by the meningitis outbreak would be
24 a good PR move?

25 A. I assume when I sent the e-mail.



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